

Fact Sheet



For Proposed Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 6, 2008.

Permit Number: **R30-06100016-2008**
Application Received: **February 18, 2011**
Plant Identification Number: **03-54-06100016**
Permittee: **Consolidation Coal Company**
Facility Name: **Blacksville No. 2**
Mailing Address: **P.O. Box 24**
Wana, WV 26590

Permit Action Number: *MM01* Revised: Proposed

Physical Location: Wana, Monongalia County, West Virginia
UTM Coordinates: 560.47 km Easting • 4395.78 km Northing • Zone 17
Directions: Approximately 1/2 mile NE of Wana and State Route 7 on County Road 1212

Facility Description

The facility is a coal preparation plant that includes a 115 mmBTU/hr coal-fired thermal dryer and coal handling facility consisting of a wet wash plant with associated coal handling equipment. Facility SIC code is 1222.

This modification application requests the following changes: construction of a truck loadout bin with conveyor; add an existing sampling system to the permit; and increase/modify refuse system for as-built change.

Emissions Summary

The proposed emissions increases associated with this modification are:

- 23.53 TPY for PM
- 7.42 TPY for PM₁₀
- 0.81 TPY for PM_{2.5}

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of CO, NO_x, SO₂, TSP, and VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Consolidation Coal Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Coal Preparation Plant
	45CSR13	
	45CSR16	NSPS
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart Y	Coal Preparation Plant

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-0718D	7/13/2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

With the changes in this modification, the following changes were made to the emission units table and the table in Condition 4.1.14:

- The old emission units table was removed and replaced with a reformatted table. This table's format matches the table in R13-0718D.
- The design capacities for some emission units were revised to more accurately represent the unit.
- Addition of a new clean coal truck loadout consisting of two conveyors (CB18 and CB18A) and a truck loadout bin (TLB) with maximum throughput rates of 1,000 TPH and 1,000,000 TPY, respectively.
- Addition of an existing sampling system, which consists of two conveyors (CB19 and CB20) and a crusher (CR1) with maximum throughput rates of 5 TPH and 43,800 TPY, respectively.
- Modification of the refuse system to incorporate as-built changes from 2004. Refuse Conveyor CB17 and Refuse Loadout Bin 2 are no longer fed by the prep plant; they are fed by Refuse Loadout Bin 1.
- Increase the maximum throughput rates for Conveyor CB10 and Refuse Loadout Bin 1 from 400 TPH and 1,920,000 TPY to 650 TPH and 5,694,000 TPY, respectively.
- After-the-fact modification of the raw coal circuit to incorporate as-built changes. The circuit now has the ability to divert raw coal from transfer point TP004 between existing Conveyors CB1 and CB2 to the Run of Mine Bin, where it will be loaded to trucks or pans.
- An after-the-fact modification of the raw coal circuit to incorporate as-built changes was made. Transfer point TP007A, which previously transferred material from Run of Mine Silo 1 to Conveyor CB3, now transfers material from Run of Mine Silo 1 to Conveyor CB15. After these changes, transfer point TP047A transfers material from CB15 to CB3, and transfer point TP007B which transfers the material from CB15 to CB7.
- Correct a previous error in Condition 4.1.14 by reversing the maximum annual permitted throughputs for Conveyor Belt No. 5 (now 4,180,000 TPY) with Conveyor Belt No. 8 (now 3,420,000 TPY).
- Correct a previous error in Condition 4.1.14 by reversing the maximum annual permitted throughputs for Conveyor Belt No. 4 (now 4,180,000 TPY) with Conveyor Belt No. 6 (now 3,420,000 TPY).

Several new permit conditions were added to R13-0718D that were identical, or worded similarly, to existing permit conditions in this Title V permit. These conditions are as follows:

- Condition 3.4.2 requires records of all odor complaints taken. This language already exists as condition 3.4.3 of this Title V permit. A citation was added referencing R13-0718D.
- Conditions 4.1.10 and 4.1.11 of R13-0718D address dust control. This language already existed as conditions 3.1.9 and 3.1.10 of this Title V permit. Citations were added referencing R13-0718D.
- Condition 4.1.15 of R13-0718D addresses standards for thermal dryers. Similar language already existed as condition 4.1.18 of this Title V permit. A citation was added referencing R13-0718D.
- Condition 4.1.13, previously condition 4.1.9, of R13-0718D addresses operation and maintenance of air pollution control equipment and was previously incorporated into this Title V permit as part of condition 4.1.23. Condition 4.1.14 was added to R13-0718D to address minimizing emissions. This language was already included in this Title V permit as part of condition 4.1.23. The citation referencing R13-0718D was updated to reference both conditions.

Several permit conditions were added referencing portions of 40 C.F.R. Part 60, Subpart Y (Coal Preparation Plant requirements). These conditions are as follows:

- Condition 4.2.9: Continuous monitoring requirements for the thermal dryer.
- Condition 4.2.10: Mechanical vent monitoring requirements.
- Condition 4.2.11: Bag leak detection system requirements.
- New conditions in Section 4.3: Various performance, visible emissions, and PM testing requirements.
- New conditions in Section 4.5: Reporting and recordkeeping requirements.

- 45CSR16 is applicable to all NSPS requirements; thus, it was referenced in all of the above-mentioned conditions.

Other changes were made with this modification. These changes are as follows:

- Condition 4.1.25 was added specifying as 12-month rolling total when determining compliance with annual throughput limits; it references condition 4.1.1 of R13-0718D. Previously, this condition was part of condition 4.1.12.
- The citation of condition 4.2.2 was revised to include a reference to condition 4.3.1 in R13-0718D. The visible emissions observations in this condition are also specified in condition 4.2.2.
- Condition 4.4.3, which requires records of the amount of raw coal transferred to the preparation plant on conveyor belts, was updated to include conveyor belt CB16. Attachment C was also updated for CB16.
- Condition 4.4.7, which requires records of all monitoring required in condition 4.2.2, was added to this Title V permit. It references condition 4.4.4 of R13-0718D.
- Condition 4.4.8, which requires all records to be certified and kept on site for five years, was added to this Title V permit. It references condition 4.1.2 of R13-0718D.
- These were minor wording and formatting changes to conditions 4.1.8, 4.1.9, 4.1.11, and 4.4.2.

Non-Applicability Determinations

The following requirement has been determined not to be applicable to the subject facility due to the following:

45CSR14-Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration: The wet wash coal preparation plant with a thermal dryer is one of the 100 TPY stationary sources listed sources under the definition of “Major Stationary Source” in 45CSR§14-2.43.a. The definition of “significant emissions increase” is defined in 45CSR§14-2.75 as equal to or greater than 25 TPY for PM, 15 TPY for PM₁₀ or 10 TPY for PM_{2.5}. The proposed increases in emissions within this modification (see the Emissions Summary) are below the trigger levels which define a significant emission increase in 45CSR14.

Greenhouse Gas Permitting. There have been no modifications to this facility that have triggered PSD permitting, thus there are no applicable greenhouse gas Clean Air Act requirements applicable to this facility.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable